

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

ALBERT FORD,

No. 1:12-cv-12079-WGY

Plaintiff,

v.

BRUCE GELB, Superintendent of the Souza
Baranowski Correctional Center;
OSVALDO VIDAL, Deputy Superintendent;
MICHAEL RODRIGUES, Deputy Superintendent,

Defendants.

AFFIDAVIT OF MICHAEL RODRIGUES

I, Michael Rodrigues, hereby depose and say:

1. I submit this affidavit to correct an error in my December 3, 2012 affidavit
(Docket No. 13-1).

2. The first sentence of paragraph 12 of my December 3, 2012 affidavit
states:

On November 3, 2012, an inmate alleged to IPS that he used metal from his
footlocker to fashion twelve weapons, which he had provided to Mr. Ford to
distribute to the Latin Kings.

3. Upon further review of the document that records the above inmate
statement, the date of the statement is November 3, 2011, not November 3, 2012.
Therefore, the above inmate statement was recorded during a prior admission of the
plaintiff, not during the current admission, which commenced on August 27, 2012.
Because the affidavit was submitted to convey information pertaining to the current
admission of the plaintiff, the first sentence of paragraph 12 should be disregarded.

Subscribed under the pains and penalties of perjury this 10th day of March, 2013.


Michael Rodrigues